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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 ***

13 DANIEL SMALL, CAROLYN SMALL.
WILLIAM CURTIN, DAVID COHEN,
14 LANETTE LAWRENCE, and LOUISE
COLLARD, Individually, and on Behalf of All
15 Other Persons Similarly Situated,

16 Plaintiff,

17 vs.

18 UNIVERSITY MEDICAL CENTER OF
SOUTHERN NEVADA;

19 Defendant.
20

CASE NO. 2-13-cv-0298-APG - PAL

**STIPULATION TO STAY DISCOVERY
PENDING MAGISTRATE JUDGE
LEEN'S DECISION ON DEFENDANT'S
OBJECTION TO SPECIAL MASTER
REPORT AND RECOMMENDATION**

21 Plaintiffs DANIEL SMALL, CAROLYN SMALL, WILLIAM CURTIN, DAVID
22 COHEN, LANETTE LAWRENCE, and LOUISE COLLARD (hereinafter collectively referred to
23 herein as "Plaintiffs") and Defendant UNIVERSITY MEDICAL CENTER OF SOUTHERN
24 NEVADA (hereinafter referred to as "Defendant"), by and through their respective counsel of
25 record, hereby stipulate and agree as follows:

26 On August 18, 2014, Special Master Daniel Garrie filed his Report and Recommendation
27 and Findings of Fact and Conclusions of Law regarding electronic discovery issues in this matter.

28 *See Dkt. No. 189.*

1 On September 2, 2014, Defendant filed its Objection to Special Master Garrie's Report and
2 Recommendation. *See Dkt. No. 207.*

3 The Court heard argument on Defendant's Objection approximately seven months ago, on
4 October 21, 2014, and took this matter under advisement. *See Dkt. No. 228.* The Court has not yet
5 issued its written order.

6 Following the parties unsuccessful attempt to resolve this litigation through mediation, on
7 April 22, 2015, Defendant served written discovery requests on 102 opt-in plaintiffs.

8 The Special Master Report and Recommendation recommends certain dispositive
9 sanctions which will impact the scope and needs of discovery in this matter.

10 Therefore, the parties hereby stipulate and agree that all discovery in this matter should be
11 stayed pending a decision by Magistrate Judge Leen on Defendant's Objection to Special Master
12 Report and Recommendation [Dkt. No. 207]. This stipulation is made pursuant to LR 7-1. Good

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1 cause exists for such a stay as the pending Objection touches on dispositive issues. *See Data Disc.,*
2 *Inc. v. Sys. Tech. Assoc., Inc.*, 557 F.2d 1280, 1285 (9th Cir. 1977) (concerning the courts' broad
3 discretion to stay discovery pending disposition of dispositive filings).

4 IT IS SO STIPULATED:

5 DATED: May 22, 2015

6 LEWIS BRISBOIS BISGAARD & SMITH LLP GLANCY PRONGAY & MURRAY LLP
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8 By: /s/ Robert W. Freeman
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22 **ORDER**

23 Upon stipulation of the aforementioned parties, and good cause appearing,

24 **IT IS HEREBY ORDERED** that discovery in this action be stayed, pending resolution of
25 Defendant's Objection to the Special Master Report and Recommendation [Dkt. No. 207].

26 DATED this 2nd day of June, 2015.

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28 U.S. MAGISTRATE JUDGE